

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ISM Vuzem d.o.o., ISM Vuzem USA, Inc.,  
Vuzem USA, Inc., and HRID-MONT d.o.o.,  
Ivan Vuzem, Robert Vuzem, Eisenmann  
Corporation, Tesla, Inc., and Does 1  
through 50, inclusive,  
Defendants..

/s/ \_\_\_\_\_  
William C. Dresser  
Attorneys for Plaintiff Sasa Maslic

Maslic, et al v ISM Vuzem, d.o.o., et al.  
US DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA  
CASE NO. 5:21-CV-02556-BLF-SVK

# Exhibit E

DEPONENT: TARA RANAE LUCIER  
SASA MASLIC vs ISM VUZEM d.o.o

May 07, 2024

1 6000088 has a total dollar amount of \$101,992,317;  
2 correct?

3 A. Yes.

4 Q. Okay.

5 And then the one we were just looking at -- which  
6 is your email -- I'll go back to it, which is pre-marked  
7 Exhibit 169 -- it has 1.98 million for purchase order  
8 ending in 887.

9 What is the purchase order that ends in 887 --  
10 what's the difference?

11 A. That would have been the -- I believe -- I  
12 wonder if I have a typo here, to be honest, looking at  
13 this again because 887 would have likely been the PO to  
14 Eisenmann on Langenbielau.

15 Q. Well, this refers to the local PO.

16 A. Yeah, either I had a typo on the PO number or  
17 typo on referring to it as the local PO.

18 Q. Right.

19 And the next one refers to an import PO; correct?

20 A. Yes.

21 Q. So the import PO is the one with the German  
22 entities; correct?

23 A. Correct, yes.

24 Q. And the local PO is the one with the Eisenmann  
25 Corporation USA; correct?



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1 was the contractual relationship.

2 Q. And that's it?

3 A. Yes.

4 Q. Correct?

5 A. Yes.

6 Q. What was the contract relationship between  
7 Tesla and any of the German Eisenmann entities?

8 A. So it would have been the other purchase order  
9 issued to Eisenmann and Langenbielau for the fixed  
10 portion of the scope.

11 Q. And do you have a copy of that other purchase  
12 order on your laptop?

13 A. I do not.

14 Q. Who does -- do you know where it is located?

15 A. It would have been in Will Drewery's emails.

16 Q. What information did Tesla receive from  
17 Eisenmann -- and that would be any of the Eisenmann  
18 entities -- about the subcontractors for work at the  
19 Fremont site?

20 A. Documentation wise I cannot find anything.

21 Q. What other information did Tesla receive from  
22 Eisenmann Corporation in connection with the plan to  
23 build out the paint shop?

24 MR. BERNAY: Objection. Vague. Ambiguous.

25 You can answer.

